

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR CONSPIRACY TO COMMIT BRIBERY
CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
WILLIAM P. MACK	*	VIOLATION: 18 U.S.C. § 371
	*	
	*	
	*	

The United States Attorney charges that:

COUNT 1
(Conspiracy to Commit Bribery)

A. AT ALL TIMES MATERIAL HEREIN:

1. From in or around 1982 through in or around July 2012, the defendant, **WILLIAM P. MACK (“MACK”)**, was an owner and/or president of First Communications Company (“FCC”), a company that, among other things, provided telecommunication services and equipment to commercial customers, including governments and municipalities. **MACK** resided in the Eastern District of Louisiana and his company, FCC, was also headquartered in the Eastern District of Louisiana.

2. Beginning in at least 2004, through 2008, **MACK**'s company, FCC, bid on and received contracts released by Jefferson Parish to provide, among other things, telecommunication services and equipment.

3. The defendant, **MACK**, beginning in at least 2002, met Aaron F. Broussard ("Broussard"), who was then a sitting Jefferson Parish councilmember. In late 2003, Broussard ran for and was elected as Jefferson Parish President. In 2007, Broussard was re-elected as Jefferson Parish President.

4. As Parish President, Broussard was the chief administrative officer of the parish and was responsible for the administration and supervision of all parish departments, agencies, and special districts. As the chief administrator of the parish, Broussard also had a role in the drafting, releasing, selection, and awarding of Jefferson Parish contracts.

5. Jefferson Parish, which is located in the Eastern District of Louisiana, is a local government/political subdivision of the State of Louisiana and, in each of the years 2003, 2004, 2005, 2006, 2007, and 2008, it received in excess of \$10,000.00 annually in federal funds.

6. As set forth below, beginning in or around 2002 through in or around late 2007, **MACK** and Broussard reached an arrangement whereby **MACK** would corruptly pay Broussard approximately \$1,500.00 per month during most months, in exchange for, among other things, Broussard's official acts and efforts to steer, among other things, Parish telecommunications work to **MACK** and his company, FCC. In total, during the time Broussard was Parish President, from in or around 2004 through in or around 2007, **MACK** corruptly paid Broussard, then the Parish President, approximately \$66,000.00, in exchange for Broussard's official acts.

B. THE CONSPIRACY:

Beginning in at least 2004 through in or around late 2007, in the Eastern District of Louisiana and elsewhere, the defendant, **WILLIAM P. MACK**, together with others known to the United States Attorney, including Broussard, did willfully and knowingly combine, conspire, confederate and agree together and with each other to commit the offense of bribery concerning programs receiving federal funds against the United States, in violation of Title 18, United States Code, Section 666(a)(2), and to conceal its commission by corruptly giving, offering, and agreeing to give anything of value, that is, approximately \$66,000.00 to Broussard, with intent to influence and reward Broussard, the President of Jefferson Parish, in connection with any business, transaction, or series of transactions of Jefferson Parish having a value in excess of \$5,000.00.

C. OVERT ACTS:

On or about the following dates, in furtherance of and to conceal the conspiracy and accomplish its purposes, the defendant, **WILLIAM P. MACK**, and others, including Broussard, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. In or around January 2004, after Broussard's election as Jefferson Parish President, **MACK** paid Broussard \$1,500.00 for Broussard's efforts to steer, among other things, Parish work to **MACK**'s company, FCC.
2. In the majority of months during the calendar year 2004, **MACK** paid Broussard approximately \$1,500.00 for Broussard's official acts as Parish President in

seeking to obtain work for FCC. During the year 2004, **MACK** paid Broussard approximately \$18,000.00 for his official acts.

3. Beginning in at least early 2004, **MACK** met with Broussard on a regular basis to discuss, among other things, telecommunications work that FCC might seek to obtain. In addition, in most of these meetings, Broussard picked up his payoffs, generally totaling approximately \$1,500.00 per month, from **MACK** at FCC's office.
4. On or about May 26, 2004, while paying kickbacks to the Parish President, Broussard, **MACK**'s company, FCC, was awarded two contracts from Jefferson Parish worth approximately \$30,000.00 in total.
5. In or around January 2005, **MACK** paid Broussard \$1,500.00 for Broussard's efforts to steer, among other things, Parish telecommunications work to **MACK**'s company, FCC.
6. For the majority of months after January 2005, during the calendar year 2005, **MACK** continued to pay Broussard approximately \$1,500.00 for Broussard's official acts as Parish President in seeking to obtain work for FCC. During the year 2005, **MACK** paid Broussard approximately \$12,000.00 for his official acts.
7. In or around early 2005, **MACK** met with Broussard on a regular basis to discuss, among other things, telecommunications work that FCC might seek to obtain. In addition, in most of these meetings, Broussard collected his illegal payoffs, generally totaling approximately \$1,500.00 per month, from **MACK** at FCC's offices.

8. On or about August 31, 2005, while paying kickbacks to the Parish President, Broussard, **MACK**'s company, FCC, was awarded a contract from Jefferson Parish for telecommunications services and equipment.
9. In or around early 2006, **MACK** paid Broussard \$1,500.00 for Broussard's efforts to steer, among other things, Parish telecommunications work to **MACK**'s company, FCC.
10. Every month after January 2006, during the calendar year 2006, **MACK** paid Broussard approximately \$1,500.00 for Broussard's official acts as Parish President in seeking to obtain work for FCC. During the year 2006, **MACK** paid Broussard approximately \$18,000.00 for his official acts.
11. In or around January or February 2007, **MACK** paid Broussard \$1,500.00 for Broussard's efforts to steer, among other things, Parish telecommunications work to **MACK**'s company, FCC.
12. Nearly every month after January 2007, during the calendar year 2007, **MACK** continued to pay Broussard approximately \$1,500.00 for Broussard's official acts as Parish President in seeking to obtain work for FCC. During the year 2007, **MACK** paid Broussard approximately \$18,000.00 for his official acts.
13. At least once in or around early 2004 and once in or around late 2007, Broussard and **MACK** sought to conceal their improper relationship and the illegal payoffs by masking the purpose of the payoffs to make them appear to be more legitimate. In reality, the monies that were paid by **MACK**, as set forth above, were for

Broussard's influence, official acts, and efforts as Parish President to steer work to FCC.

14. In or around March 2008, Jefferson Parish sought to hire a company for a communications project via a Request for Proposal ("RFP") and Broussard, with **MACK's** help, attempted to tailor the RFP in an effort to steer the project, which was worth nearly \$200,000.00, to **MACK's** company, FCC.

All in violation of Title 18, United States Code, Section 371.



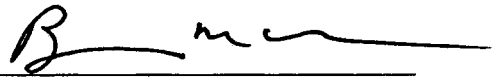
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New Orleans, Louisiana
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